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Subject : Comment to Docket FAA-2004-17681 - Fuel Tank Safety Compliance Extension (Final Rule) and Aging Airplane Program Update from Dec.,2004 to Dec.,2008
Reference : SFACT/N.AT/2004/3016

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Dear Madam/Sir,

First of all, we are very grateful for the opportunity given to DGAC to comment on this Docket.

The ASTRAC group was tasked in 1996 to expand the aging programme to cover non-structural systems. It appears that, at that time, priority was given to electrical systems and wiring in particular.

In parallel, DGAC, as primary authority for Airbus aircraft, has conducted with Airbus an aging system analysis, not restricted to wiring. This analysis consists in assessing the impact of aging (beyond initial certification hypothesis) on the failure rate of all systems and equipments whose failure are involved in a combination of failures leading to Hazardous or Catastrophic consequences.
We have asked Airbus to identify all those systems and to justify that their failure rate was stable along the life of the aircraft, and if not, to propose an associated maintenance/overhaul program to restore the value of this failure rate.

This has been done for the A300/A300-600/A310 programs by Airbus ("High Time Equipment" assessment) and has led to maintenance programs being updated to add maintenance tasks and overhaul or replacement requirements, the most critical ones being mandated by Airworthiness Directives. All ATA chapters are covered by this analysis, with main focus on hydraulics, flight control, powerplant and electrical systems. A section of the Maintenance Planning Document is now dedicated to these new maintenance tasks derived from this analysis and this section will be rendered mandatory per Airworthiness Directive action.

Recent events have shown that incorrect maintenance together with aging of critical systems (like Trimmable Horizontal Stabiliser Screws) may lead to catastrophic consequences, it is therefore DGAC's view that extension of the aging activity to all

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systems that could be involved in hazardous to catastrophic failure is necessary to achieve the aircraft aging programme at a time when more and more aging aircraft are flying our skies. DGAC renews its support to FAA action on aging and, per these comments to Docket FAA-2004-17681, would like to highlight the necessity to make regulation evolve also for the systems. As DGAC has found useful to perform this aging analysis on systems for Airbus aircraft, it is also our belief that such an analysis would be of benefit to other transport category aircraft of similar design, the most adequate way to put such an activity into force being by updating the regulation accordingly and by expanding its scope to the non-structure related parts of the aircraft.

Best regards

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